

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

JUAN ALBERTO MEDRANO-BAEZ

Criminal No. 04-10228-RGS

JOINT MEMORANDUM FOR FINAL STATUS CONFERENCE

The parties submit this Joint Memorandum For Final Status Conference pursuant to Local Rule 116.5(C).

1. The government has provided and made available discovery. There are no outstanding discovery issues.
2. Neither party anticipates providing additional discovery, with the exception of expert witness materials should the case proceed to trial.
3. The defendant does not intend to raise a defense of insanity or public authority.
4. The government has not requested notice of alibi.
5. At this time, the defendant does not anticipate filing any motions requiring a ruling by the District Court before trial. The defendant, however, reserves the right to file such motions.
6. No schedules should be set for any matter other than trial.
7. The parties have discussed the possibility of an early resolution to the case. At this time, the parties expect a resolution prior to trial.
8. The parties hereby agree to the periods already excluded by order of this Court September

10-14-04

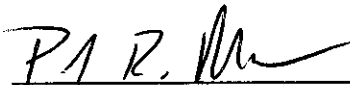
Noreen Ruzz

28, 2004. In addition, the parties request that the time between the Initial Status Conference and the Final Status Conference be excluded pursuant to 18 U.S.C. § 3161(h)(8)(A). As grounds, the parties state that preliminary negotiations have begun in an attempt to resolve this case prior to trial. It is expected that the additional time will allow the parties the necessary time to reach a final resolution prior to trial.

9. If required, the parties anticipate that trial should take not more than two days.

Respectfully submitted,

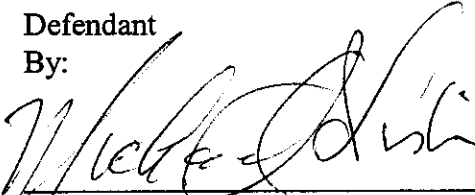
MICHAEL J. SULLIVAN
United States Attorney
By:



Paul R. Moore
Assistant U.S. Attorney

Respectfully submitted,

JUAN ALBERTO MEDRANO-BAEZ
Defendant
By:



Michael Liston
Counsel for the Defendant

DATE: October 14, 2004